

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Charlottesville Division**

MATAN GOLDSTEIN,)
)
 Plaintiff,) Case No. 3:24-cv-00036-RSB-JCH
)
 v.)
)
 THE RECTOR AND VISITORS OF THE)
 UNIVERSITY OF VIRGINIA, *et al.*,)
)
 Defendants.)

UNOPPOSED MOTION FOR EXTENSION

Defendants The Rector and Visitors of the University of Virginia and President James E. Ryan (collectively, the “UVA Defendants”), by counsel, respectfully move the Court for an Order extending the time allowed for the UVA Defendants to respond to Plaintiff’s Amended Complaint under Federal Rule of Civil Procedure 15(a) and to extend the ordinary briefing schedule permitted under Local Rule 11 for all parties. In support of this Motion, the UVA Defendants state as follows:

1. Plaintiff filed this civil action on May 17, 2024.
2. On July 1, 2024, Defendants Students for Peace and Justice in Palestine at UVA (SJP) and Faculty for Justice in Palestine at UVA (FJP) moved to dismiss all claims against them. ECF No. 21. On July 16, 2024, the UVA Defendants moved to dismiss all claims against them pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). ECF No. 26.
3. On August 6, 2024, Plaintiff filed an Amended Complaint. ECF No. 39. Plaintiff’s Amended Complaint is 167 pages long, and contains 674 paragraphs of allegations.
4. Pursuant to Federal Rule of Civil Procedure 15(a)(3), without an extension, Defendants’ response(s) to the Amended Complaint would be due on August 20, 2024.

5. The UVA Defendants request additional time to fully investigate and respond to Plaintiff's numerous allegations.

6. Undersigned counsel for the UVA Defendants has conferred with Counsel for other parties regarding this request. Counsel for Plaintiff has stated that he does not oppose this Motion. Plaintiff's Counsel in turn requests that his opposition to Defendants' Motion to Dismiss, if any, be extended to October 15, 2024. Counsel for SJP and FJP also consent to the proposed extension of time.

7. The UVA Defendants accordingly propose an extended briefing schedule applicable to all parties as follows: (a) Responsive pleadings due September 10, 2024; (b) opposition briefs, if any, due October 15, 2024; and (c) reply briefs, if any, due October 29, 2024.

8. This extended briefing schedule would allow all parties to fully brief the extensive allegations and complex issues raised in Plaintiff's Amended Complaint.

9. This Motion is not made for the purpose of delay or other improper cause, and the requested extension will not prejudice any party.

WHEREFORE, the UVA Defendants respectfully request that this Court grant an extension to the respective responsive pleading deadlines as follows: (1) that all Defendants' responsive pleadings be due September 10, 2024; (2) that Plaintiff's opposition to any such pleadings be due October 15, 2024; and (3) that all Defendants' reply briefs, if any, be due October 29, 2024.

Dated: August 13, 2024

/s/Juliet B. Clark
Jonathan T. Blank (VSB No. 38487)
McGuireWoods LLP
323 2nd St. SE, Suite 700
Charlottesville, VA 22902
Tel.: (434) 977-2509

Fax: (434) 980-2258
jblank@mcguirewoods.com

Farnaz F. Thompson (VSB No. 75982)
McGuireWoods LLP
888 16th Street N.W., Suite 500
Black Lives Matter Plaza
Washington, D.C.
Tel: (202) 857-1000
Fax: (202) 857-2737
fthompson@mcguirewoods.com

Heidi E. Siegmund (VSB No. 89569)
Juliet B. Clark (VSB No. 96918)
McGuireWoods LLP
800 East Canal Street
Richmond, VA 23219
Tel.: (804) 775-1000
Fax: (804) 775-1061
hsiegmund@mcguirewoods.com
jbclark@mcguirewoods.com

*Counsel for Defendants the Rector and
Visitors of the University of Virginia,
Robert D. Hardie, and James. E. Ryan*

CERTIFICATE OF SERVICE

I certify that on August 13, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/Juliet B. Clark
Juliet B. Clark

*Counsel for Defendants the Rector and
Visitors of the University of Virginia, Robert
D. Hardie, and James. E. Ryan*